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Via ECF filing only

May 11, 2012

Hon. Alvin K. Hellerstein
United States District Court
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
Room 1050
500 Pearl Street
New York, NY 10007

Re: In Re: World Trade Center Site Litigation
Case.: 21 MC102

Dear Judge Hellerstein:

I am counsel for Defendants Nomura Holding America Inc. and Nomura Securities International Inc. ("Nomura") in the above referenced litigations. I am writing in connection with the deposition of the Nomura defendants in the Group I discovery phase of these litigations.

I have conferred with Robert Grochow, Esq., Plaintiffs' Liaison Counsel, regarding Nomura's deposition. Due to work commitments and a personal commitment of Nomura's witness he is not available to be produced by the August 3, 2012 discovery cutoff as set forth in the Court's February 22, 2012 Order or during July, the time period set aside by Mr. Grochow for the depositions of defendants located in the World Financial Center (Buildings 1 through 3). Nomura's witness is available on August 7, 8 or 9, 2012.

Subject to the Court's approval Mr. Grochow has no objection to conducting Nomura's deposition on either August 7, 8, or 9, 2012. We respectfully request that the Court grant permission to the parties to conduct Nomura's deposition at a mutually convenient date between August 7 and August 9, 2012. We note that if granted, Nomura's deposition will be conducted prior to the Court conference scheduled for August 15, 2012. No prior application has been made for the relief requested herein.

Respectfully submitted,
S/HOWARD F. STRONGIN
HOWARD F. STRONGIN

HFS/ia

cc: via ecf
Robert Grochow, Esq.
All Counsel